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 And NP Red Rock LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSHUA HUSOK,)	Case No.: 2:20-cv-01939-KJD-DJA
Plaintiff,)	
)	STIPULATION AND ORDER TO
vs.)	EXTEND SCHEDULING ORDER
)	DEADLINES
)	(Fifth Request)
STATION CASINOS, LLC, a Nevada)	
Limited Liability Company; NP RED)	
ROCK, LLC, d/b/a RED ROCK)	
CASINO, RESORT AND SPA, a)	
Nevada Limited Liability Company;)	
ROE Business Organizations I-X; and)	
DOE INDIVIDUALS I-X, Inclusive,)	
)	
Defendants.)	

The parties, by and through their respective counsel, hereby stipulate to extend the Scheduling Order deadlines in this case as follows:

Discovery Deadline	March 4, 2022
Dispositive Motion Deadline	April 4, 2022
Joint Pretrial Order	May 4, 2022 or 30 days from the ruling on a dispositive motion

This is the fifth request for an extension of these deadlines. The parties provide the following information regarding the proposed extension of the discovery deadline.

Discovery Completed to Date

The parties have served their Initial Disclosures and supplements thereto. Defendants have served interrogatories and requests for production and Plaintiff has responded. Plaintiff has served two sets of interrogatories and two sets of requests for production and Defendants have responded. Jennifer Johnson has been deposed. Rita Oliveri and Kiernia Jimenez-Milan were deposed June 28. Plaintiff was deposed on July 12, but his cross-examination was postponed because Plaintiff's counsel had a flare-up of a medical condition that caused the deposition to stop. Antonio Nunez was deposed September 13. Tia Campbell and Betty Martin were deposed September 15. Nyemma Demmons was deposed September 22. Erika Hernandez and Sammy Flores were deposed October 19. Stacy King was deposed October 21. Plaintiff's deposition was concluded on October 25. The depositions of Zezy Farfan, Elizabeth Alva and Guicela Alva are scheduled for January 10-11, 2022, and Michelle Cortes will be deposed upon service of a subpoena.

Remaining Discovery to Be Completed

After the completion of the depositions scheduled for this month, it is believed the only remaining discovery will be on Plaintiff's Rule 30(b)(6) deposition topics.

Reasons Discovery Could Not Be Completed Within the Existing Deadline

The Court may recall that the parties have agreed to consolidate discovery in this case with discovery in the somewhat related case of *Farfan v. Station Casinos LLC et. al.* (Case No. 2:20-cv-01516-JAD-NJK), which requires additional time to prepare for and take each deposition. In addition to the holidays and both counsel having the usual assortment of depositions, motions, hearings, mediations and appellate work in other cases, defense counsel will be preoccupied during the second half of January with

1 preparing for a two-day arbitration hearing set to begin February 1, and Plaintiff's
2 counsel continues to deal with ongoing health problems relating to herself and an
3 elderly parent (as outlined in previous submissions to the Court).

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5 ***Proposed Dates for Completion of Discovery***

6 The parties believe they will be able to complete discovery by the proposed new
7 date of January March 4, 2022.

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Attorney for Defendants

By: /s/Victoria L. Neal
Victoria L. Neal, Esq.
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Attorney for Plaintiff

13 IT IS SO ORDERED:

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15 _____
UNITED STATES MAGISTRATE JUDGE

16 Dated: January 5, 2022
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